

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	<div style="background-color: black; width: 100px; height: 1em;"></div>
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**NETLIST, INC.’S UNOPPOSED MOTION TO FILE EXHIBITS IN
EXCESS OF THE PAGE LIMIT**

Plaintiff Netlist, Inc. (“Netlist”) intends to file the following motions to compel discovery from Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively “Samsung”):

- (1) Motion to Compel Deposition of Jun Soo Choi; and
- (2) Motion to Compel Rule 30(b)(6) Deposition Testimony and Responses to Questions for Which Samsung’s Counsel Improperly Instructed Seungmo Jung Not to Answer (the “Motion to Compel Seungmo Jung”).

The Court’s March 11, 2020 Standing Order Regarding Meet and Confer Obligations Relating to

Discovery Disputes provides that “[a]ttachments to a discovery related motion . . . shall not exceed 5 pages.” Netlist respectfully asks the Court for permission to extend the page limit for Netlist’s exhibits attached to the above referenced motions. Specifically, Netlist intends to file (1) 45 pages of exhibits in total attached to Netlist’s Motion to Compel Deposition of Joo Sun Choi; and (2) 35 pages of exhibits in total attached to Netlist’s Motion to Compel Seungmo Jung.¹

Netlist believes that this page extension is necessary and warranted to allow for adequate presentation of the issues raised in Netlist’s motions. Specifically, with respect to Netlist’s Motion to Compel Deposition of Joo Sun Choi, Netlist seeks to attach exhibits relevant to show Mr. Choi: ■■■■■

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■■■■■ ■■■■■
■■■■■.

In connection with Netlist’s Motion to Compel Seungmo Jung, Netlist seeks to attach as exhibits Netlist’s notices of deposition, preliminary infringement contentions, transcript of the deposition of Mr. Seungmo Jung, and email communications between Netlist’s and Samsung’s counsel to explain why further deposition of Samsung’s corporate representative would be necessary. These materials can provide the Court the full context to reach a resolution of the parties’ disputes.

The parties have met and conferred on November 20, 2023. Samsung indicated that it will not oppose Netlist’s motion. Netlist does not object to Samsung receiving the similar page limit for its responses to Netlist’s motions.

¹ The page counts do not include the cover sheets or attorney declarations identifying these exhibits.

Thus, Netlist respectfully asks the Court for permission to file exhibits in excess of the page limit provided under the March 2020 Standing Order. An order reflecting the relief requested is attached.

November 20, 2023

/s/ Jason G. Sheasby

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**ATTORNEYS FOR PLAINTIFF
NETLIST, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on November 20, 2023.

/s/ Yanan Zhao
Yanan Zhao

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Plaintiff conferred with counsel for Defendants on November 20, 2023. Defendants do not oppose the present motion.

/s/ Yanan Zhao
Yanan Zhao